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March 7, 2011

VIA U.S. Mail

Mr. Darrell Nitschke
Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard Ave., Dept. 408
Bismarck, ND 58505-0480

RE: Bison 1B Wind Project
 Oliver/Morton Counties
 Siting Application
 Case No. PU-09-151

 Bison 2 Wind Project
 Oliver/Morton Counties
 Siting Application
 Case No. PU-11-57

Dear Mr. Nitschke:

Enclosed please find Minnesota Power's Tree and Shrub Mitigation Plan relating to the above-referenced cases. An original and 10 copies are included.

Please let me know if you have any questions.

Yours truly,

David R. Moeller

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Minnesota Power Tree and Shrub Mitigation Plan

For Bison 1B (PU-09-151) and Bison 2 (PU-11-57)



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Minnesota Power Tree and Shrub Mitigation Plan



Introduction

In 2011 Minnesota Power (an Allete company) completed construction of the second phase (phase 1B) of its Bison 1 81.8 MW wind energy conversion facility (Facility). In addition, MP began construction of its Bison 2 105 MW Facility. During construction some trees and shrubs were disturbed. In keeping with the Certificate of Site Compatibility for both Facilities, Minnesota Power has developed a Tree and Shrub Mitigation Plan. This mitigation plan will facilitate the replacement of the trees and shrubs that were disturbed during construction and will minimize any associated environmental impacts.

Number and Variety of Trees

The trees and shrubs that were disturbed during construction of Bison 1, phase 1A were mitigated in 2011. No trees or shrubs were disturbed during construction of the Bison 2 Facility. As a result, the following table (Table 1-1) shows the total number of trees and shrubs that were disturbed during construction of phase 1B of the Bison 1 Facility. Post construction vegetation surveys were performed by KDK Consulting, Kelly Krabenhof-Certified Professional Range Management.

The species disturbed have been organized into section-township-range. The tree and shrub numbers are as follows:

Table 1-1 Stems Disturbed (by Species) During
Bison 1, Phase 1B Construction.

Common Name	Scientific Name		
		Sec. 25 T141N, R86W	Sec. 26 T141N, R86W
Shrubs	-	-	-
Chokecherry	<i>Prunus virginiana</i>	5	3

*No tree or shrub species were removed during construction of Bison 2.

Mitigation Plan

Following the requirements in the North Dakota Public Service Commission Certificate of Site Compatibility for the Bison 1 Facility, Minnesota Power will replace all disturbed trees and shrubs. The trees and shrubs disturbed during construction are required to be replaced at a minimum ratio of 2:1. However, the actual planting will be at a ratio closer to 3:1 to account for mortality associated with any planting/re-vegetation effort.

All disturbed trees and shrubs will be replaced by the same species in following with the North Dakota Public Service Commission's Tree and Shrub Mitigation Specifications.



Upon completion of mitigation activities, the planting site will then be monitored for three years to ensure that there has been a 75% survival rate based on a **2:1** planting regime. Survival surveys will occur in the fall of each year and will be used to determine if any additional mitigation activities will be required.

Proposed Number, Variety, Type

Table 1-2 lists the original species that were disturbed during construction, the number of species disturbed and the number of mitigation stems that will be planted. Again, these planting numbers are based on a 3:1 planting ratio however, the percent survival will be determined assuming a 2:1 planting ratio.

Table 1-2 # Stems Disturbed (by Species) During Construction of Bison 1, Phase 1B

Common Name	Scientific Name		
Shrubs		Plants Removed	Plants to Replace*
Chokecherry	<i>Prunus virginiana</i>	8	24

*The # of species to plant was estimated using a 3:1 ratio.

** No Species were disturbed during construction of Bison 2.

Location and Date of Replacements

In an effort to maintain customer satisfaction, project acceptance and a high standard of public relations, Minnesota Power has developed an alternative site for the mitigation plantings to occur if requested by land owners. Land owners have their choice to have mitigation activities occur either on their ownership or on Minnesota Power's alternative site. Due to the kind of species planted, all affected land owners prefer mitigation (planting) activities not occur on their ownership and have instead opted for Minnesota Power's alternative site.

The Minnesota Power alternate site is located in Morton County in Section 4 - Township 140N - Range 86W. See Attached Figure #1 for mitigation site location information.

Figure 1.

-Mitigation Site Location

Minnesota Power Alternative Mitigation Site.

Legend

- Bison Area Roads
- PLSS_townships
- PLSS_sections



0.25

Miles



34

35

T141NR 86W

36

5

4

T140NR 86W

3

8

9

10

Minnesota Power's
Alternative Mitigation Site.



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Tree and Shrub Mitigation Plan- Bison 1B & Bison 2.

Appendix A.

-Alternative Mitigation Agreements



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Alternative Mitigation Location Agreement

Terrance and Sherry Doll, whose property is located in Section 26 Township 141N-Range 86W, CONSENTOR, for valuable consideration, hereby acknowledge consent and convey unto MINNESOTA POWER legally incorporated as ALLETE, Inc., a Minnesota corporation, CONSENTEES and its successors, the right to perform tree and shrub mitigation activities at a mitigation restoration site which is not located on the CONSENTOR personal property.

The CONSENTOR understand that this replaces their rights to have tree and shrub mitigation, as required by applicable permits issued by the North Dakota Public Service Commission, activities performed on the CONSENTOR personal property in favor of a location determined at the CONSENTEES discretion.

CONSENTOR

NAME HERE

Terrance Doll

NAME HERE

Sherry Doll

COUNTY OF Oliver.

This instrument was drafted by:
Minnesota Power
30 West Superior Street
Duluth, MN 55802



minnesota power / 30 west superior street / duluth, minnesota 55802-2093 / 800-228-4966 / www.mnpower.com

Alternative Mitigation Location Agreement

Henry and Bertha Freidt, whose property is located in Section 25 Township 141N-Range 86W, CONSENTOR, for valuable consideration, hereby acknowledge consent and convey unto MINNESOTA POWER legally incorporated as ALLETE, Inc., a Minnesota corporation, CONSENTEES and its successors, the right to perform tree and shrub mitigation activities at a mitigation restoration site which is not located on the CONSENTOR personal property.

The CONSENTOR understand that this replaces their rights to have tree and shrub mitigation, as required by applicable permits issued by the North Dakota Public Service Commission, activities preformed on the CONSENTOR personal property in favor of a location determined at the CONSENTEES discretion.

CONSENTOR

NAME HERE

Bertha Freidt

NAME HERE

Henry Freidt

COUNTY OF Oliver.

This instrument was drafted by:
Minnesota Power
30 West Superior Street
Duluth, MN 55802

Appendix B

-Woodland Inventory Procedures & Survey Results

- Bison 1B
 - Trees
 - Shrubs
- Results

WOODY SPECIES DISTURBANCE REPORT
FOR ALLETE, INC. BISON I WIND PROJECT-
PHASE 1B- SHRUBS/TREES
IN OLIVER/MORTON COUNTIES OF NORTH DAKOTA

Prepared by KDK Consulting
Kelly Krabbenhoft- Certified Professional Range Management
February 2012

Woodland inventory within the easement corridors for Phase 1B of the Bison I Wind Project was conducted in late September 2010 by KDK Consulting. The inventory was conducted to meet the specifications outlined in Case No. PU-09-151. This was accomplished by conducting a thorough ground-truth reconnaissance. All tall shrubs/trees were inventoried by species through direct counts within the sample area. Low shrubs were estimated by utilizing information gathered from 2-meter by 2-meter quadrats collected in 30 representative areas along the transmission line corridor. This methodology for low shrub sampling is utilized for baseline sampling protocol within coal mining permits in North Dakota. Average stems per quadrat can then be converted to stems per acre. This will assist in extrapolation of total stems removed by potential disturbance in the mapped low shrub community acreage within the corridor. Sample adequacy (Stein's) was met for the low shrub inventory. Western snowberry patches within the easement corridor had similar densities based on ocular estimations, allowing for utilization of the previous quadrats from the transmission corridor.

All data by each tree and shrub species related to the disturbance inventory conducted in early February can be found in Tables 1 and 2 following construction of Phase 1b for the Bison I Wind Farm. The only trees/tall shrubs (5 Chokecherry) with a dbh greater than 3 inches located within the easement corridors of Phase 1B were along the fenceline in the SW4 Section 25 T141N, R86W and each of these were removed. The remaining 3 disturbed chokecherry (>1" dbh but less than 3") were along the fenceline separating the SW4 & SE4 Section 26 T141N, R86W (all 3 were located in the SW4). None of the western snowberry had stems greater than the 1" threshold as found in the specifications.

Now that the determinations of disturbance numbers by species are calculated, a planting plan and survivability monitoring protocol can be outlined to mitigate these losses due to construction. Depending upon each owner's preference, these losses can be either planted within their own lands or possibly the total disturbance could be pooled together for one off-site planting to be determined later.

Table 1- Shrub/Tree Species Observed Along Phase 1B Easement Boundary for the Bison I Wind Project

					Number of Individuals Disturbed
Common Name	Scientific Name	Number of Individuals in Easement Boundary	Number of Acres in Easement Boundary	Estimated Stems per Acre Based on Quadrat Sampling ¹	in Easement Boundary >1"(Shrub), >3" (Trees)
Trees					
Russian Olive	<i>Eleagnus angustifolia</i>	2			0
TOTAL		2			0
Shrubs					
Chokecherry	<i>Prunus virginiana</i>	11			8
Western Wild Rose	<i>Rosa woodsii</i>	3			0
Western Snowberry	<i>Symphoricarpos occidentalis</i>		0.830663	67915 (6792 Plants)	0
TOTAL		14	0.830663 ³	67915 (6792 Plants)	8

¹ Data for quadrat sampling to determine stems per acre found in Table 2; Data based on total stems- divide by 10 for total plants (assumes 10 clones for every plant)

³ Total number of western snowberry stems (and plants) estimated within the easement boundary based on statistically valid sampling from Transmission Corridor- 56,415 (5,642)